

## UNITED STATES DISTRICT COURT

for the  
District of Oregon

In the Matter of the Search of  
 (Briefly describe the property to be searched  
 or identify the person by name and address)

Information associated with email accounts  
 supermatchescort@gmail.com and  
 markzongtaochen@gmail.com

)  
 )  
 )  
 )  
 )

Case No. 19 -MC- 208

FILED 8 MAR 19 11:35 AM 2019

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Information associated with email accounts supermatchescort@gmail.com, and markzongtaochen@gmail.com, as described in Attachment A hereto,

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

evidence of a crime;  
 contraband, fruits of crime, or other items illegally possessed;  
 property designed for use, intended for use, or used in committing a crime;  
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
 18 U.S.C. §§ 2, 371, 1952,  
 and 2421

Offense Description  
 Conspiracy to knowingly transport individuals in interstate and foreign commerce  
 with the intent that such individuals engage in prostitution or in any sexual activity  
 for which any person can be charged with a criminal offense

The application is based on these facts:  
 See affidavit which is attached hereto and incorporated herein by this reference.

Continued on the attached sheet.

Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested  
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

JUNE PINIEWSKI, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/08/2019



Judge's signature

STACIE F. BECKERMAN, United States Magistrate Judge

Printed name and title

City and state: Portland Oregon

DISTRICT OF OREGON, ss:

AFFIDAVIT OF JUNE PINIEWSKI

**Affidavit in Support of an Application**  
**for a Search Warrant for an Email Account**

I, June Piniewski, being duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. As a Special Agent of the FBI, I am authorized to investigate violations of the criminal laws set forth in Title 18 of the United States Code. I am currently assigned to the Portland Division of the FBI where I investigate violations of federal law, including bank robberies, crimes against children, sex trafficking offenses, and other violent crimes. I have been involved in multiple investigations of matters involving sex trafficking, particularly as it relates to violations of 18 U.S.C. § 2421. I have had extensive training in law enforcement investigation techniques, including but not limited to 800 hours of training at the FBIs Academy at Quantico, Virginia. Prior to joining the FBI, I was a Deputy Sheriff in Hillsborough County, Florida, for approximately five years, where I participated in the investigation of various crimes, including violent crimes.

2. I submit this affidavit in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Google and Microsoft (MSN Online Services) (hereinafter “Email Providers”) to provide information, including the content of communications, associated with e-mail accounts: supermatchescort@gmail.com, chen\_zong\_tao@hotmail.com, and markzongtaochen@gmail.com, (referred to as the “Email Accounts”), which are further described in Attachment A to this affidavit. As set forth below, I have probable cause to believe that the Email Accounts are related to and contain evidence related to a group of people who are engaged in a criminal conspiracy that is knowingly

**AFFIDAVIT OF JUNE PINIEWSKI**

**Page 1**

transporting individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense and are using a facility in interstate commerce to promote, manage, establish, carry on or facilitate the promotion, management, establishment or carrying on of unlawful prostitution activities, all in violation of Title 18 United States Code, Sections 2, 371, 1952, and 2421, and that evidence related to this crime; contraband, fruits of the crime, items illegally possessed; and, property designed for use, intended for use or used in committing this crime will be found within the Email Accounts sought to be searched, as set forth in Attachment B to this affidavit.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

#### APPLICABLE LAW

4. 18 U.S.C. § 1952(a)(3) makes it a crime to knowingly use a facility in interstate or foreign commerce, specifically computers and cellular telephones, with intent to promote, manage, establish, and carry on acts to facilitate the promotion, management, establishment, and carrying on of an unlawful activity namely, a business enterprise involving prostitution offenses in violation of the laws of the State in which they are committed, to-wit prostitution in violation of Oregon Revised Statute (ORS) 167.007 and of the United States, and thereafter performed and

attempted to perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity; 18 U.S.C. § 2421 makes it a federal felony for anyone to knowingly transport an individual in interstate or foreign commerce, with the intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so. 18 U.S.C. § 371, makes it a crime for two or more persons to conspire to commit any offense against the United States and for one or more of the people to do any act to effect the object of the conspiracy. 18 U.S.C. § 2 provides that whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission is punishable as a principal.

**RELEVANT ELECTRONIC AND WIRE COMMUNICATION STATUTES**

5. The relevant federal statutes involved in the disclosure of customer communication records for the requested data in the Email Accounts are as follows:

- a. 18 U.S.C. § 2703(a) provides, in part,

A governmental entity may require the disclosure by a provider of electronic communication service of the contents of a wire or electronic communication, that is in electronic storage in an electronic communications system for one hundred and eighty days or less, only pursuant to a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.

- b. 18 U.S.C. § 2703(b)(1) provides, in part.

A governmental entity may require a provider of remote computing service to disclose the contents of any wire or electronic communication . . . (A) without required notice to the subscriber or customer, if the governmental entity obtains a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.

c. 18 U.S.C. § 2703(c)(1) provides, in part,

A governmental entity may require a provider of electronic communication service or remote computing service to disclose a record or other information pertaining to a subscriber to or customer of such service (not including the contents of communications) only when the governmental entity—(A) obtains a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.

d. 18 U.S.C. § 2510(1) defines a “wire communication” as

any aural transfer made in whole or in part through the use of facilities for the transmission of communications by the aid of wire, cable, or other like connection between the point of origin and the point of reception furnished or operated by any person engaged in providing or operating such facilities for the transmission of interstate or foreign communications or communications affecting interstate or foreign commerce.

e. 18 U.S.C. § 2510(12) defines “electronic communication” as “any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photo-electronic or photo-optical system that affects interstate or foreign commerce,” with certain exceptions not applicable here.

f. 18 U.S.C. § 2510(17) defines “electronic storage” as “any temporary, intermediate storage of a wire or electronic communication incidental to the electronic transmission thereof” and “any storage of such communication by an electronic communication service for purposes of backup protection of such communication.”

g. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. §§ 2703(a), (b)(1)(A), (c)(1)(A) and 2711. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

**STATEMENT OF PROBABLE CAUSE**

**A. Sex Trafficking**

6. I have received formal and on-the-job training in connection with the investigation of sex trafficking and related crimes. I have participated in several investigations that led to the arrest and conviction of traffickers and have become familiar with the habits, mannerisms, language, and techniques used in committing human trafficking offenses. I have also become familiar with the attempts to conceal the evidence of such occurrences from detection by both the public at large and law enforcement agencies. I have spoken with and have read documentation by officers who possess knowledge and expertise in the investigation of sex trafficking-related crimes. I have spoken to numerous victims of sex trafficking about their experiences in the life of prostitution. I have also participated in many different aspects of sex trafficking investigations, including conducting physical surveillance, interviews, reviewing electronic evidence, using confidential human sources, writing and executing search and seizure warrants, and making arrests. I have gained knowledge of the inner working of Sex Trafficking Organizations (“STOs”) and based on my training and experience know the following:

7. Prostitution is inherently a cash business, as cash provides paying customers with some form of anonymity. STOs often move and launder the cash by placing it into bank accounts and investment accounts, using casinos to launder sources of cash, operating cash-based businesses such as restaurants, using wire transfers, and purchasing store value credit/debit cards, online e-currency, real estate, and other types of assets. STOs will often move the illegal proceeds several times through different forms of assets to make it difficult for law enforcement to discover the true source of the funds. STOs will often open legitimate businesses or have legitimate employment to launder the illegal proceeds and comingle these illegal funds with

legitimate income from the business or employment to prevent law enforcement from discovering the true source of the proceeds.

8. Websites such as backpage.com,<sup>1</sup> adultsearch.com, supermatchescort.com, portlandasianescort.com, and others are often used by STOs to advertise commercial sex services. I know that STOs will often advertise their services as “massages” or “escorts” to avoid detection by law enforcement. The term “escort” is widely used as a euphemism for prostitution. I know that a legitimate escort is hired for an extended period of time such as several hours and even days, is expected to be attractive and presentable in public, and is often used to stand-in as a date for specific functions or entertainment for an evening. Escorts are paid for their time and their company, and sexual favors are not included as part of their services. Legitimate escorts or massage parlors do not list coded language for the services they provide such as GFE (Girlfriend Experience) or BBJ (Bare Blowjob). I also know that legitimate escorts or massage parlors do not typically advertise services posting sexually provocative photographs or by providing age, height, or the weight of the person providing the massage. Legitimate escort and massage businesses typically do not operate from an apartment or a motel room paid on a day-by-day basis. I also know legitimate escorts and masseuses do not perform sexual acts on their customers and therefore do not provide condoms or wear lingerie when interacting with the customer.

9. STOs post online ads for “escorts” or “massages” that investigators recognize as prostitution-related advertisements. The investigation has revealed the following roles within a STO:

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<sup>1</sup> On April 6, 2018, backpage.com (a classified ad website) and affiliated websites were seized and shut down by the United States Federal Government due to their promotion of sex trafficking and prostitution.

- a. *Customers* – men who pay money for sexual acts
- b. *Providers* – individuals who perform sex acts for money
- c. *Drivers* – individuals who transport the providers and perform other activities such as collecting proceeds and delivering food or other supplies
- d. *Leasee* – individuals who lease the apartments that are used as brothels
- e. *Dispatcher* – individuals who answer the calls/texts/emails (responses to ads) from the customers, sets up “dates” within the computer scheduling software, and notifies the provider
- f. *Boss* – a supervisor of one or more brothel locations

10. Through this investigation, I have learned how STOs manage operations of the online ads. When a customer responds to the ad and calls the number associated with the ad, they are connected to “dispatch.” Dispatch identifies the location of the customer and assigns the customer to a specific provider for a “date” (an encounter for the purposes of engaging in a commercial sex act with the women). Dispatch then notifies the provider that a “date” has been set.

11. STOs arrange apartments and hotels for the provider to stay in and use for engaging in acts of prostitution. As part of this investigation, law enforcement has conducted over twenty undercover sting operations in Portland, Oregon, targeting Asian “escort” ads. In these sting operations, an undercover officer sets up a “date” using the contact phone number provided in the ad. After confirming the date and obtaining an address through the STO dispatch, the undercover officer is told to notify dispatch when they have arrived. Once the undercover has arrived, dispatch will provide the motel room number or apartment number.

12. Once inside the apartment, investigators notice very little furniture and that the bedroom in the apartment appears to be used only for sex acts. Investigators rarely see a bedframe and often the mattress has just a sheet with a towel laid on top. The nightstands next to the bed usually have multiple unused condoms on or near them, towels, and various bottles of oils and lubricants. The clothing in the closets or in the suitcases consist mainly of lingerie.

13. The STOs recruit women to work as providers from their respective countries (generally China or other Asian countries), and the women generally speak very little English. Some providers have indicated they are engaging in prostitution to repay certain costs, such as the cost of coming to the United States.

***Chen STO***

14. For the past two years, I have been investigating sex trafficking, mainly focused on Asian STOs. As this investigation unfolded, I learned multiple agencies (both local and federal) across the country have encountered Asian STOs. The investigation revealed multiple Asian STOs, the main one of which is an international sex trafficking organization (hereafter referred to as the “Chen STO”) operating throughout the United States, Canada, and Australia. The following are known and indicted subjects in this current investigation:

a. ***Zongtao Chen, a.k.a “Mark” Chen (hereinafter “Chen”)*** – Chen is suspected of being the main facilitator for an Asian STO operating in the United States, Canada, and Australia. Chen is suspected of facilitating and coordinating the interstate and foreign travel of women, primarily Chinese national females (“CNFs”), for criminal sexual activity, and of using online websites such as supermatchesescort.com to promote prostitution. Chen is located in the Toronto, Ontario region.

b. *Yan Wang, a.k.a. "Sarah" Wang (hereinafter "Wang")* – Wang is suspected of acting as dispatch for the Chen STO by setting up “dates” for the CNFs to engage in prostitution.

c. *Weixuan Zhou (hereinafter "Zhou")* – Zhou is suspected of facilitating and recruiting CNFs in China and North America to work as prostitutes and of financing voluminous amounts of prostitution-related advertisements and domains, including the **Subject Domain Names**.

15. Between June 16, 2016 and July 10, 2016, the FBI received approximately 19 anonymous tips submitted to Crime Stoppers of Oregon that identified Zongtao Chen as a facilitator for an Asian STO operating in Canada and the United States. Chen is specifically named as the renter of several hotels and condominiums used by the STO in the United States and Canada.

16. One tip received on June 16, 2016, read,

International prostitution ring operating in Portland. When will you shut down this operator? They offer unprotected sex acts. 1,000's of people are at health risk. Hotels and short term condo rentals is the way they do business. Mark Chen from Toronto may have a hand in the condo part of the business. He is a real estate broker. Advertisement today in Backpage: \*Portland Asian Escort\* Best Asian student \*New Kelly 34DD\*-19. Come to enjoy the best Asian experience, new Kelly, 19, 34DD, 100lbs, she will rock your world. Portland Downtown in call 503-850-2545 or 647-687-7096, WeChat: aa585466383 www.nyasianangels.com.

17. Another tip received on June 23, 2016, read,

Some tips for the international prostitution ring operating in your city: Mark Chen is a real estate broker from Toronto. Leader? Tenant Name: Zong Tao Chen (aka Mark Chen) Contact Phone Number 416-732-4321. Numbers used: WeChat: aa5854660383, call or text: 206-866-6735, call or text: 323-498-1660 347-594-5090, call or text: 503-850-2545 520-433-9310 . . .

The tip continued listing several other phone numbers and addresses.

***Online Presence of the STO***

18. The Chen STO uses [supermatchescort.com](http://supermatchescort.com) as their main website to post online prostitution-related advertisements. The [supermatchescort.com](http://supermatchescort.com) website displays multiple pictures of Asian women posing in a provocative manner, often wearing lingerie or bikinis. (See Image A) The [supermatchescort.com](http://supermatchescort.com) website has a menu listing their “supermatch girls,” the rates charged, a description of the site, a way to contact the site to set up “dates,” employment, a press room, and the “girls in your city.” Many of the advertisements also provide a description of the prostitution-related services they offer using coded language, such as BBJ (bare blowjob) and GFE (girlfriend experience – prostitution acts involving kissing). The [supermatchescort.com](http://supermatchescort.com) website also links to an email address, [supermatchescort@gmail.com](mailto:supermatchescort@gmail.com), a phone number, and a WeChat contact, which are used to carry out the criminal activities of the organization by allowing individuals to contact the Chen STO directly.



Image A

19. On the main page of the website “supermatchesescort.com,” it reads, “about us,” and then below reads, “Super Match Escort, arrange you to meet with our professional Massages. They come from many different backgrounds. They are happy and fun to be accompanying with, let our Massages bring you the total enjoyment of life.” The advertisements are arranged by city corresponding to the areas the Chen STO services. (See Image B).

**Image B**

The screenshot shows the homepage of SuperMatch Escort. At the top, there is a logo for "SuperMatch Escort" with the website address "www.supermatchesescort.com". To the right of the logo are the phone number "6476877096" and an email address "E-Mail:supermatchesescort@gmail.com". On the far right, it says "customer service". Below the header, there is a navigation menu with links to "SuperMatch Girls", "OUR RATES", "ABOUT US", "CONTACT US", "EMPLOYMENT", "PRESS ROOM", and "GIRLS IN YOUR CITY >>>". There is also a "Live assist" button with a QR code and a small image of a woman. The main content area is titled "HOME PAGE Welcome". Below this, there is a table with a header "Cities" and a list of cities. The cities are listed in two columns. A red box highlights the entry for "Portland, OR".

Cities			
All	Albuquerque NM	Anaheim CA	Atlanta GA
Augusta GA	Austin TX	Bakersfield CA	Bismarck ND
Brisbane, AU	Calgary AB	Camarillo CA	Dallas TX
Denver Co	Des Moines, IA	Detroit MI	Edmonton AB
Fairfax VA	Fargo ND	Fort Collins CO	Fort Wayne IN
Grand Junction CO	Grand Rapids, MI	Green Bay WI	Halifax NS
Houston TX	Inglewood CA	Kansas City MO	Los Angeles, CA
Madison WI	Melbourne AU	Milwaukee WI	Minneapolis, Mn
Minot ND	New York, NY	Newark, CA	Niagara Falls, ON
Oakland CA	Odessa TX	Oklahoma City	Ontario CA
Palmdale CA	Philadelphia PA	Portland, OR	Provo, UT
Red Reed AB	Sacramento CA	Salt Lake City	San Diego, CA
Seattle WA	Sioux Falls SD	South Bend IN	Spokane WA
Springfield MO	Sydney AU	Tacoma WA	Toronto ON
Tucson AZ	Warwick RI	Williston ND	Windsor ON
Winnipeg MB	Yakima WA		

20. A majority of the cities have a secondary website that can be accessed from the “supermatchesescort.com” website. When you click on “Portland, OR,” you are directed to providers available within Portland, OR. Each provider’s listings contain a link titled “Portland Asian Escort,” which will redirect you to the website, “portlandasianescort.com.”

21. One of the listings for Portland, Oregon, was for “Asian Sophia” and read as follows:

Asian Sophia  
Beaverton/Tigard/Airport  
503-765-9147 or 6362872242  
Incall/outcall 24/7  
**PORTLAND ASIAN ESCORT**  
Portland Escort Young, pretty, sexy

(See Image C).

Image C

The screenshot shows the homepage of SuperMatch Escort. At the top, it features the logo 'SuperMatch Escort' with the website address 'www.supermatchescort.com'. To the right, the phone number '6476877096' and email 'E-Mail: supermatchescort@gmail.com' are displayed, along with a 'customer service' link. A navigation bar on the left includes links for 'SuperMatch Girls', 'OUR RATES', 'ABOUT US', 'CONTACT US', 'EMPLOYMENT', 'PRESS ROOM', and 'GIRLS IN YOUR CITY >>'. A 'Live assist' button with a QR code for WeChat is also present. The main content area displays two escort profiles: 'Asian Sophia' and 'Asian Jenny'. Each profile includes a small photo, the escort's name, address, phone number, and service details. The 'Portland Asian Escort' link is highlighted with a red box. The 'Asian Sophia' profile also includes a 'WeChat: #ivesescort' link. The 'Asian Jenny' profile includes a 'Portland Escort' link.

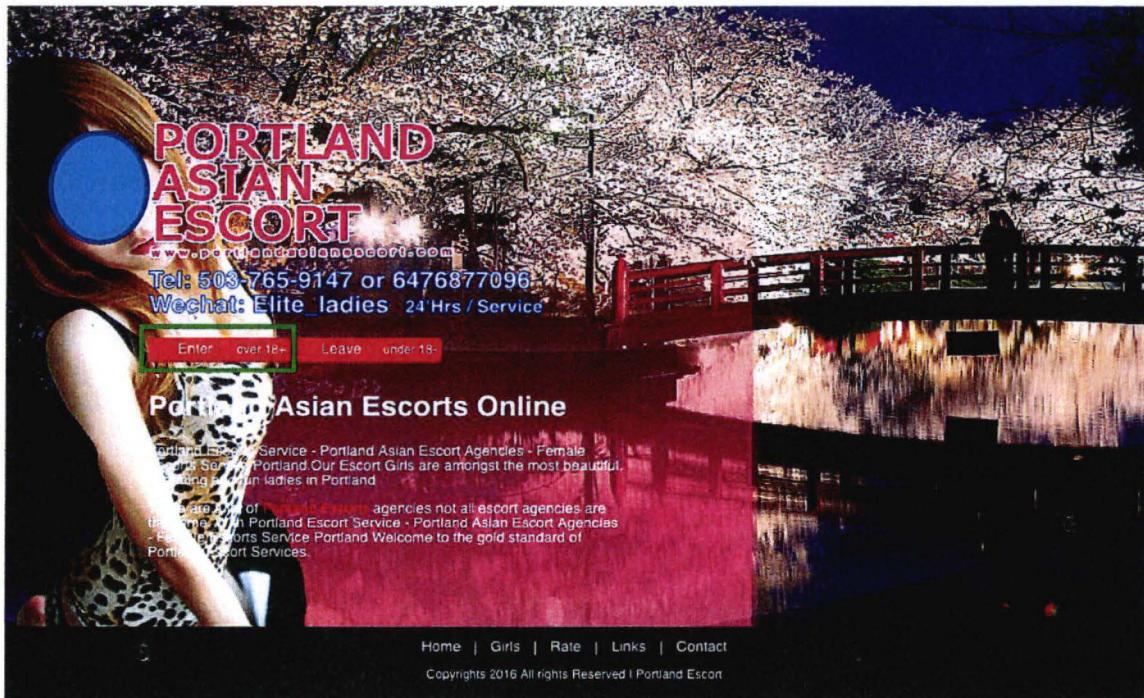
22. I know from my training and experience that “Incall/Outcall” are common terms used in escort service advertisements. “Incall” is where the customer comes to the provider’s location and “Outcall” is where the provider goes to the customer’s location.

23. On the website, [www.portlandasianescort.com](http://www.portlandasianescort.com), the homepage states, Portland Asian Escort Tel: 503-765-9147 or 6362872242, WeChat:aa5854660383, 24 Hrs Service Portland Escorts Service – Portland Asian Escort Agencies – Female Escorts Service Portland Welcome to the gold standard of Portland Escort Services. We

offers the best selection of Portland Escorts at the best price imaginable. Our Escort Girls are amongst the most beautiful, charming and fun ladies in Portland.”

(See Image D).

Image D

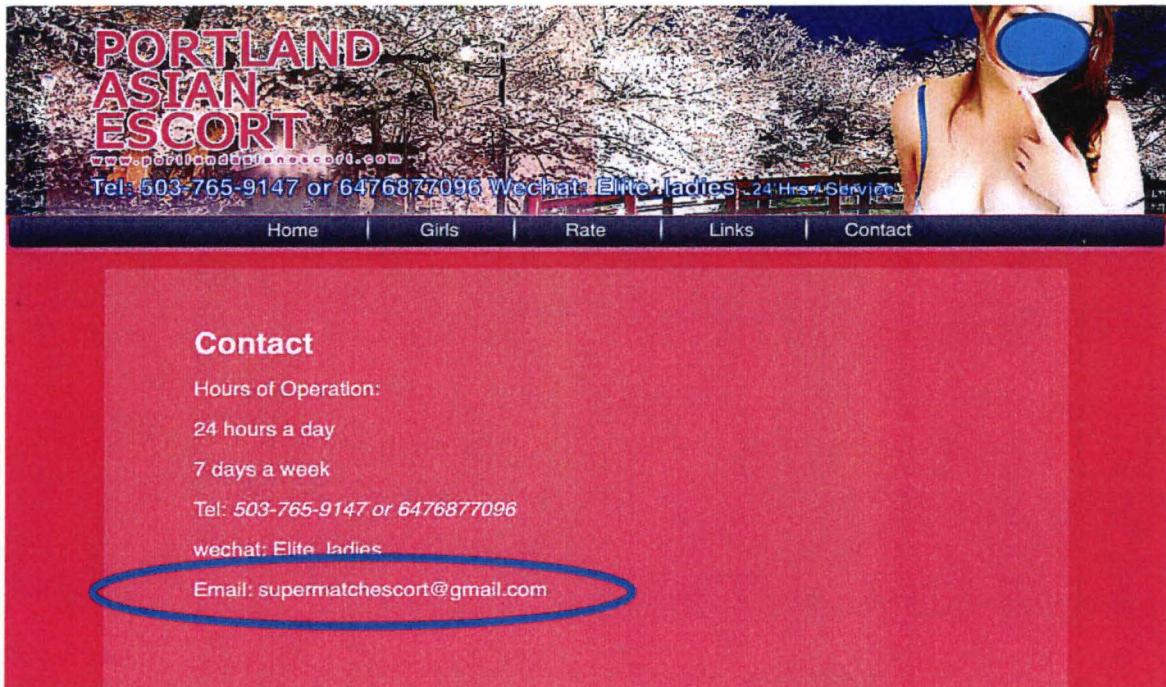


24. One advertisement states the following on the photograph of an Asian female, “Shower Together, Bbj-kissing-69 Style, Young, Pretty, Sweet, Wet Tight Pussy, Licking-sucking-touching, Girlfriend Experience everything u want.”

25. Based on my experience, I know Bbj is a common term used among prostitution related ads to mean Bare blow job, which is oral sex without a condom. I also know 69 is a common term for an inverted sexual position where simultaneous oral sex occurs.

26. The email address under the contact portion of this website is supermatchesescort@gmail.com. (See Image E).

Image E



#### *Subject Domain Names in Chen STO*

27. In the current, Portland-based investigation, I have found approximately 500 websites that I believe the Chen STO uses or has used for online solicitation of Asian prostitution. Of the 500 sites, approximately twenty-five of the domains are hyperlinked within the "supermatchesescort.com" website and associated to the email supermatchesescort@gmail.com.

(See Image F, a compilation of some of the homepages).

Image F



28. On or about November 2018, the FBI accessed publicly available information regarding twenty-five domains associated with the email address supermatchescort@gmail.com. (See Image G, the twenty-five domain names).

Image G	www.supermatchescort.com	www.saltlakecityasianescort.com
	www.asianescortsatlanta.com	www.sandiegoasianescort.com
	www.dallasescortasian.com	www.seattleasianescorts.com
	www.denverescortasian.com	www.siouxfallsasianescort.com
	www.fargoasianescort.com	www.tacomaasianescort.com
	www.fortcollinsasianescort.com	www.tucsonasianescort.com
	www.kansasasianescort.com	www.providenceasianescort.com
	www.laasianescort.com	www.calgaryasianescort.com
	www.milwaukeeasianescort.com	www.torontoescortsasian.com
	www.minneapolisasianescort.com	www.edmontonasianescort.com
	www.nyescortasian.com	www.melbourneescortss.com
	www.oaklandasianescort.com	www.sydneyasianescorts.com
	www.portlandasianescort.com	

29. On or about March 19, 2018, a Grand Jury subpoena return from Google for subscriber information related to the email address supermatchescort@gmail.com identified the subscriber's name as Zongtao Chen, with a recovery email of markzongtaochen@gmail.com and a phone number of 416-732-4321. Through additional subpoena returns and a search of law enforcement databases, I discovered other emails linked to Chen: markzongtaochen@gmail.com and chen\_zong\_tao@hotmail.com.

**B. Email Returns for Hotmail Email Address**

***Information showing chen\_zong\_tao@hotmail.com belongs to Mark Chen***

30. A search warrant return from Hotmail for the content of the email address chen\_zong\_tao@hotmail.com demonstrates that Mark Chen used the email address for personal

use, including documenting the U.S. addresses he used, presumably for bank cards. (See Image H).

Image H

**Subject: Bank card address**  
**From: zong\_tao <chen\_zong\_tao@hotmail.com>**  
**Date: 2/25/2017 11:28 PM**  
**To: zong\_tao <chen\_zong\_tao@hotmail.com>**



31. Another email displays a picture of Mark, which is consistent with the appearance of the Mark Chen indicted in this case: (See Image I)

Image I



*Hotmail email address linked to other emails, including supermatchescort@gmail.com*

32. The warrant return showed that the Hotmail email address received emails from “Zongtao Chen” using the email address supermatchescort@gmail.com with two 5-digit numbers and the website escorts-canada.com in the subject line. (See Image J). This type of message lacking details and context is consistent with the same person using both email addresses.

Image J

**Subject:** <http://www.escorts-canada.com>  
**From:** Zongtao Chen <[supermatchescort@gmail.com](mailto:supermatchescort@gmail.com)>  
**Date:** 4/7/2018 2:10 PM  
**To:** [zong\\_tao@hotmail.com](mailto:zong_tao@hotmail.com)

22442  
22445

33. The Hotmail email address also received email messages from its own email address with a prostitution-related website in the subject and body of the message. I later learned that Mark Chen suggested another STO use this website to advertise prostitution services. (See Image K).

Image K

**Subject:** [skipthegames.com](http://skipthegames.com)  
**From:** [zong\\_tao@hotmail.com](mailto:zong_tao@hotmail.com) <[chen\\_zong\\_tao@hotmail.com](mailto:chen_zong_tao@hotmail.com)>  
**Date:** 2/27/2017 3:09 AM  
**To:** [zong\\_tao@hotmail.com](mailto:zong_tao@hotmail.com) <[Chen\\_zong\\_tao@hotmail.com](mailto:Chen_zong_tao@hotmail.com)>

[skipthegames.com](http://skipthegames.com)

34. The Hotmail address also received an email from [markzongtaochen@gmail.com](mailto:markzongtaochen@gmail.com) with the subject “email account” and body text “my email,” which may indicate he wanted to keep track of which email addresses he had set up for himself. (See Image L).

Image L

**Subject:** email account  
**From:** Zongtao Chen <[markzongtaochen@gmail.com](mailto:markzongtaochen@gmail.com)>  
**Date:** 12/15/2016 5:56 PM  
**To:** "chen\_zong\_tao@hotmail.com" <[chen\\_zong\\_tao@hotmail.com](mailto:chen_zong_tao@hotmail.com)>

my email

35. Another email, which was sent to the Hotmail address from [supermatchescorts@gmail.com](mailto:supermatchescorts@gmail.com), appears to be several examples in English for responses to men looking for dates. The responses contain what appears to be the addresses of brothels or hotels used as brothels in different cities across the United States and Canada. (See Image M).

Image M

**Subject:** address  
**From:** Zongtao Chen <supermatchescort@gmail.com>  
**Date:** 12/16/2016 7:57 AM  
**To:** chen\_zong\_tao@hotmail.com

--add2.txt--

Hi hun, I am at Commons inn - 5780 West St, Halifax, NS .... what time will you come?

Hi hun, I am at 550 S Florence St, Wichita 67209.. what time will you come?

Hi hun. I am at Residence & Conference Centre - Ottawa Downtown - 150 Hazel st, Ottawa K1S 5T8(1c5). what time is good for you?

Hi hun, I am at 1828 S Wentworth Ave, Chicago IL 60616-4955. what time will you come hun? 140hh 180 h

Hi hun, I am at 3160 West 8th St, Los Angeles, 90005 - Palga Grand hotel.. what time will you come?

Hi hun, I am working at 4950 s outlet center dr, Tucson, az 85706,... what time is good for you?

Hi hun. nice asian at 10160 114 st nw, edmonton. what time is good for you? 140hh 240 1h 100qv

I am working at 10320 45 Ave NW, Edmonton. what time is good for you?

36. In numerous undercover operations, some of which are outlined below, after law enforcement officers would contact the number from an escort advertisement, law enforcement would receive a message addressed to "Hi hun" in a response similar to those above.

***Travel records/money transfers***

37. The Hotmail email search warrant also revealed numerous emails containing records of money transfers from individuals with Asian female names, some of which I know are involved in the Chen STO. I summarized the transaction details obtained from those emails, in part, below. (See Image N).

Image N

Transaction Date	Name	Transaction Amount
6/17/2018	Meihua Zhuang	\$350
6/3/2018	Meihua Zhuang	\$1,000
6/1/2018	Meihua Zhuang	\$680
5/30/2018	Meihua Zhuang	\$510
5/26/2018	Meihua Zhuang	\$300
5/23/2018		
5/19/2018	Meihua Zhuang	\$710
5/15/2018	Meihua Zhuang	\$300
4/30/2018	Ting Fu	\$1,500
4/19/2018	Ting Fu	\$1,000
4/3/2018	Lu Chen	\$614
2/18/2018	Ting Fu	\$1,125
2/23/2018	Li Hong	\$300
2/14/2018	Li Hong	\$1,000
2/10/2018	Ting Fu	\$1
2/8/2018	Ting Fu	\$1,000
2/2/2018	Lu Chen	\$30
2/3/2018	Ting Fu	\$500
2/3/2018	Lu Chen	\$170
2/2/2018	Lu Chen	\$30
2/2/2018	Lu Chen	\$200
2/1/2018	Lu Chen	\$100
1/31/2018	Lu Chen	\$70
1/30/2018	Lu Chen	\$110
1/28/2018	Ting Fu	\$300
1/27/2018	Ting Fu	\$250
1/27/2018	Ting Fu	\$1
1/24/2018	Wei-Yen Hsu	\$280
1/18/2018	Wei-Yen Hsu	\$1,000
1/16/2018	Wei-Yen Hsu	\$1,000
1/12/2018	Wei-Yen Hsu	\$1,000
1/9/2018	Wei-Yen Hsu	\$800
1/2/2018	Wei-Yen Hsu	\$100
12/28/2017	Meihua Zhuang	\$180
12/27/2017	Wei-Yen Hsu	\$500
12/27/2017	Meihua Zhuang	\$120
12/26/2017	Wei-Yen Hsu	\$295

38. Of note, this investigation identified Lu Chen as a provider out of Sioux Falls, South Dakota, as detailed later in this affidavit.

#### ***Hotels Booked***

39. The Hotmail email search warrant also revealed numerous emails containing hotel reservations for individuals with Asian female names, one of which I later identified as a provider. I summarized the reservation details obtained from those emails, in part, below. (See Image O).

Image O

	Jun-18 NAME	HOTEL	ADDRESS OF HOTEL
3rd-5th	Chia-Chi Yu	Candlewood Suites	2601 Abbott Plaza, Omaha, NE 68110
3rd-5th	Yen-Yi Su	Comfort Inn & Suites	4822 East Washington Avenue, Madison, WI 53704
6th-8th	Yen-Yi Su	Rodeway Inn & Suites	4400 S 27th Street, Milwaukee, WI 53221
6th-10th	Kwai C Wong	Microtel Inn & Suites	801 East 78th Street, Bloomington, MN 55420
	May-18 NAME	HOTEL	ADDRESS OF HOTEL
10th-12th	Chia-Chi Yu	America's Best Value Inn	754 Horizon Drive, Grand Junction, CO 81506
12th-14th	Jianhong Li	Baymont	120 W University Dr, Mishawaka, IN 46545
13-15	Mei-Huan Chen	Microtel Inn & Suites	3820 4th Avenue West, Williston, ND
14-16	Ke Cheng	Clarion Inn & Suites	3370 East Battlefield Road, Springfield, MO 65804
15-18	Mei-Huan Chen	Home Place Lodge & Suites	1505 15th Avenue West, Williston, ND 58801
18-20	Yen-Yi Su	Super 8	5253 South Howell Avenue, Milwaukee, WI 53207
18-20	Chia-Yin Chang	Days Inn	1964 University Avenue West, Saint Paul, MN 55104
18-20	Kwai C Wong	Ramada by Wyndham	407 Lyons Avenue, Sioux Falls, SD 57106
22-24	Hong-Qin Wang	Extended Stay America	245 West Natick Road, Warwick, RI 02886
24-26	Hong-Qin Wang	Extended Stay America	3747 29th Street South East, Grand Rapids, MI 49512
24-26	Lixia Zha	Ramada by Wyndham	5601 Fortune Circle West, Indianapolis, IN 46241
26-28	Yanping Zhou	America's Best Value Inn	754 Horizon Drive, Grand Junction, CO 81506
26-28	Lixia Zha	America's Best Value Inn	3401 South Keystone Avenue, Indianapolis, IN 46237
26-28	Yimin Liang	Comfort Inn & Suites	4822 East Washington Avenue, Madison WI 53704
26-28	Lixia Zha	Americas Best Value Inn	3401 South Keystone Avenue, Indianapolis, IN 46237
28-30	Qirong Yuan	Motel 6	20 Jefferson Blvd, Warwick, RI 02888
	Aug-17 NAME	HOTEL	ADDRESS OF HOTEL
10th-13th	Jianhong Li	Extended Stay America	7956 Lyndale Avenue S., Bloomington, MN 55420
15th-17th	Youchun Xiong	Portland Travelodge	1200 Brighton Avenue, Portland, ME 04102
17th-18th	Youchun Xiong	Motel 6	1 Riverside St, Portland, ME 04103
2nd-4th	Hong Chen	Quality Inn South Bluff	1165 S Bluff Street, St. George, UT 84770
	Oct-17 NAME	HOTEL	ADDRESS OF HOTEL
2nd-4th	Hong Chen	Quality Inn South Bluff	1165 S Bluff Street, St. George, UT 84770

40. I found numerous emails sent to Mark Chen requesting a rating or review of hotel stays across the United States, made in the names of Asian females. (See Image P).

Image P

DATE OF EMAIL	NAME	HOTEL WITH CITY
4/19/2018	Li-Lun	Hawthorne Suites, Williston
3/27/2018	Min Luo	Woodspring Suites, Sioux Falls
3/19/2018	Min Luo	Comfort Suites, Sioux Falls
5/2/2018	Fang	Baymont by Wyndham, Grand Forks
5/15/2018	Hong-Qin Wang	Hawthorne Suites, Fargo
7/1/2017	Jianhong Li	Red Roof Inn, Rockford
7/27/2017	Jianhong Li	Microtel Inn & Suites Bloomington Minneapolis
8/9/2017	Jianhong Li	Motel 6, St Paul I-94

***Transportation Booked***

41. In the Hotmail email search returns, I discovered numerous flight reservations made in the names of Asian females. Some of the names used in the flight reservations correspond to names used for hotel reservations. I summarized the flight details obtained from those emails, in part, below. (See Image Q).

Image Q

2017 NAME	AIRLINE	DEPARTURE/ARRIVAL
11/1/2017 Xinrong Zhao	Delta	San Jose CA/Salt Lake City
9/19/2017 Ying Luan	WestJet	Montreal/Calgary
9/15/2017 Ying Luan	WestJet	Halifax/Calgary
8/11/2017 Youchun Xiong	Delta	Milwaukee/Los Angeles
8/22/2017 Youchun Xiong	American Airlines	Boston/Chicago
7/9/2017 Youchun Xiong	Delta	Portland OR/Tucson
7/15/2017 Youchun Xiong	Delta	Tucson/Atlanta
5/19/2017 Hongqin	Delta	Bismarck ND/NYC
5/18/2017 Yen Yi	Delta	NYC/Chicago
4/18/2017 Yu-Tai Hsu, Chi-Ling Hsu	Spirit	Minneapolis/Los Angeles
2018 NAME	AIRLINE	DEPARTURE/ARRIVAL
7-Jun Mei-huan Chen	United	Salt Lake City/Denver
18-May Chiayin Chang	Spirit	Los Angeles/Minneapolis
8-May Ke Cheng	Spirit	Los Angeles/Kansas City
14-Jan Hongbo Wang	Jetblue	Los Angeles/NYC

42. I also found several reservations for Greyhound Bus travel to and from destinations the Chen STO uses for prostitution operations, with the exception of Bend, Oregon. I summarized the bus details obtained from those emails below. (See Image R). Of note, one of the reservations specifically referenced billing “Zongtao,” which I believe is a reference to billing Mark Chen.

Image R

DATE	NAME	DEPARTURE/ARRIVAL
6/18/2018	Chia-Chi Yu	Sioux Falls/Fargo
6/6/2018	Kwai C Wong	Sioux Falls/Minneapolis
7/29/2017	Kwai C Wong	Las Vegas/St George
7/31/2017	Kwai C Wong	St George/Provo
2/25/2017	Xin Hong Liu	Portland OR/Bend
12/30/2016	Chunling Hou	Toronto/Ottawa
		<b>Billed to Zongtao</b>

43. Preservation notices were served to MSN Hotmail and Google for the contents of the Email Accounts supermatchescort@gmail.com, chen\_zong\_tao@hotmail.com, markzongtaochen@gmail.com on or about June 5, 2018. This warrant seeks information contained within the email addresses since the last search warrant was executed.

44. On November 15, 2018, Mark Chen and others were indicted by a Federal Grand Jury in the District of Oregon and arrest warrants were issued. In January 2019, Mark Chen and others involved in the Chen STO were arrested on those warrants.

**C. Email Providers**

45. From my training and experience, I have learned that MSN Hotmail and Google, (the E-mail Providers) provide a variety of on-line services, including electronic mail ("email") access, to the public. The E-mail Providers allows subscribers to, respectively, obtain email accounts at the domain names outlook.com, hotmail.com, and gmail.com like the Email Accounts listed in Attachment B. Subscribers obtain such accounts by registering with the E-mail Providers. During registration process, the E-mail Providers asks subscribers to provide basic personal information. The E-mail Providers stores information concerning their subscribers and the subscribers' use of the Provider's services, including account access information, email transaction information, account application information, and electronic

communications, including retrieved and unretrieved email. From my training and experience, I know that such information may constitute evidence of the crimes under investigation because the information can be used to identify the Email Accounts' user or users.

46. From my training and experience, I know that the E-mail Providers generally ask their subscribers to provide certain personal identifying information when registering for an email account. Such information can include the subscriber's full name, physical address, telephone numbers, and other identifiers, alternative email addresses, and, and, for paying subscribers, means of source of payment (including any credit or bank account numbers). From my training and experience, I know that such information may constitute evidence of the crimes under investigation because the information can be used to identify the accounts' user or users.

47. In my training and experience, Email Providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via the provider's website), and other log files that reflect usage of the account. In addition, E-mail Providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the Email Accounts.

48. From my training and experience, I know that in some cases email account users will communicate directly with a provider about issues relating to the account, such as technical

problems, billing inquiries, or complains from other users. E-mail Providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications. From my training and experience, I know that such information may constitute evidence of the crimes under investigation because the information can be used to identify the accounts' user or users.

49. This application seeks a warrant to search all responsive records and information under the control of the E-mail Providers, who are subject to the jurisdiction of this court, regardless of where the E-mail Providers have chosen to store such information. The government intends to require the disclosure, pursuant to the requested warrant, of the contents of wire or electronic communications and any records or other information pertaining to the customers or subscribers if such communication, record, or other information that is within the E-mail Providers' possession, custody, or control, regardless of whether such communication, record, or other information is stored, held, or maintained outside the United States.<sup>2</sup>

50. As explained herein, information stored in connection with an email account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, the

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<sup>2</sup> It is possible that the Providers store some portion of the information sought outside of the United States. In *Microsoft Corp. v. United States*, 2016 WL 3770056 (2nd Cir. 2016), the Second Circuit held that the government cannot enforce a warrant under the Stored Communications Act to require a provider to disclose records in its custody and control that are stored outside the United States. As the Second Circuit decision is not binding on this court, I respectfully request that this warrant apply to all responsive information—including data stored outside the United States—pertaining to the identified account that is in the possession, custody, or control of the Providers. The government also seeks the disclosure of the physical location or locations where the information is stored.

information stored in connection with an email account can indicate who has used or controlled the account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, email communications, contacts lists, and images sent (and the data associated with the foregoing, such as date and time) may indicate who used or controlled the account at a relevant time. Further, information maintained by the E-mail Providers can show how and when the account was accessed or used. For example, as described above, E-mail Providers typically log the IP addresses from which users access the email account along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the email account access and use relating to the crime under investigation. This geographic and timeline information may tend to either inculpate or exculpate the account owner. Additionally, information stored in the user’s account may further indicate the geographic location of the account user at a particular time (e.g., location information integrated into an image or video sent via email). Stored electronic data may provide relevant insight into the email account owner’s state of mind as it relates to the offense under investigation—that is, information in the email account may indicate the owner’s motive and intent to commit a crime (e.g., communications relating to the crime) or consciousness of guilt (e.g., deleting communications in an effort to conceal them from law enforcement).

**D. Nature of Examination**

51. During its review of the information received from the E-mail Providers under this warrant, law enforcement, if feasible, will segregate the information into two groups: (i) information that is responsive to the warrant and that the government may therefore seize; and

(ii) information that is not responsive to the warrant. This review will be performed within a reasonable amount of time not to exceed 180 days from the date of execution of the warrant. If the government needs additional time to conduct this review, it may seek an extension of the time period from the Court.

52. Information that is responsive to the warrant will be copied onto a separate storage device or medium. Responsive information may be used by law enforcement in the same manner as any other seized evidence. Information that is not responsive to the warrant will be sealed and stored on a secure medium or in a secure location. Nonresponsive information will not be reviewed again without further order of the Court (e.g., subsequent search warrant or order to unseal by the district court).

53. The government will retain a complete copy of the information received from the E-mail Providers for a number of reasons, including proving the authenticity of evidence to be used at trial, responding to questions regarding the corruption of data, establishing the chain of custody of data, refuting claims of fabricating, tampering, or destroying data, and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.

### **CONCLUSION**

54. Based on the nature of the criminal activity involving websites and electronic communications and based on the previous searches, pursuant to a warrant, of these same Email Accounts, I have probable cause to believe that evidence of criminal violations may be found within the Email Accounts. Moreover, based on my training and experience, I believe that the user(s) of the email addresses supermatchesescort@gmail.com, chen\_zong\_tao@hotmail.com, and

markzongtaochen@gmail.com in particular, would have possibly engaged in email communication related to sex trafficking and money laundering.

55. Therefore, I have probable cause to believe, and I do believe, that the Email Accounts identified above and in Attachment A are related to and contain evidence related to a group of people who are engaged in a criminal conspiracy that is knowingly transporting individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense and are using a facility in interstate commerce to promote, manage, establish, carry on or facilitate the promotion, management, establishment or carrying on of unlawful prostitution activities, all in violation of Title 18 United States Code, Sections 2, 371, 1952, and 2421, and that evidence related to this crime; contraband, fruits of the crime, items illegally possessed; and, property designed for use, intended for use or used in committing this crime will be found within the Email Accounts sought to be searched, as set forth in Attachment B to this affidavit. I therefore request that the Court issue a warrant authorizing a search of the Email Accounts described in Attachments A for the items listed in Attachment B and the examination and seizure of any such items found. Because the warrant will be served on the E-mail Providers, who will then compile the requested records at a time convenient to them, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

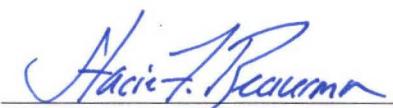
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56. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested search warrant were all reviewed by Assistant United States Attorney (AUSA) Julia Jarrett who advised me that in her opinion the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.



JUNE PINIEWSKI  
Special Agent, FBI

Subscribed and sworn to before me this 8th day of March 2019.



STACIE F. BECKERMAN  
United States Magistrate Judge

**ATTACHMENT A**

**Places To Be Searched**

This warrant applies to information associated with

1.) supermatchesescort@gmail.com

2.) markzongtaochen@gmail.com

that is stored at premises owned, maintained, controlled, or operated by Google, Inc., a company that accepts service of legal process at 1600 Amphitheatre Parkway, Mountain View, California 94043.

**ATTACHMENT B**

**Particular Things to Be Seized**

**I. Information to Be Disclosed by Google, Inc. (hereinafter "Email Provider")**

A. To the extent that information associated with email accounts listed in Attachment A (hereinafter "Email Accounts") is within the possession, custody, or control of Email Provider, including any emails, records, files, logs, or information that has been deleted but is still available to the Provider or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on June 5, 2018, Provider is required to disclose the following information to the government for the time period of June 29, 2018 to the date of the execution of the search warrant, for each account listed in Attachment A:

1. The contents of all emails, including any deleted e-mails that are still recoverable by Email Provider, associated with the Email Accounts, including stored or preserved copies of emails sent to and from the Email Accounts, draft emails, the source and destination addresses associated with each email, the date and time at which each email was sent, and the size and length of each email.

2. All records or other information regarding the identification of the Email Accounts, to include full customer or subscriber name, customer or subscriber physical address, local and long distance connection records, telephone numbers, and other identifiers, records of session times and durations, the date on which the Email Accounts were created, the length of service, the IP address used to register the Email Accounts, log-in IP addresses associated with session times and dates, account status, alternative

email addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number).

3. The types of service utilized.

4. All records or other information stored at any time by an individual using the Email Accounts, including address books, contact and buddy lists, calendar data, pictures, and files.

5. All records pertaining to communications between Email Provider and any person regarding the Email Accounts, including contacts with support services and records of actions taken.

6. For all information required to be disclosed pursuant to this warrant, the physical location or locations where the information is stored.

B. The Email Provider is hereby ordered to disclose the above information to the government within fourteen days of service of this warrant.

## **II. Information to Be Seized by the Government**

A. All information described above in Section I that constitutes evidence of violations of 18 U.S.C. §§ 2, 371, 1952, and 2421, for the time period of June 29, 2018 to the date of the execution of the search warrant, for each account listed in Attachment A pertaining to the following matters:

1. Information relating to who created, used, or communicated with the Email Accounts, including records about their identities and whereabouts.

2. Email messages, records, and files associated with or attached to email messages, and transactional data that constitute evidence of, that may have been used to

facilitate, and that were capable of being used to commit or further violations of 18 U.S.C. §§ 2, 371, 1952, and 2421 and to create, access, or store evidence of such crimes.

3. Information relating to who created, used, and communicated with the Email Accounts, including records about their identities and whereabouts.
4. Information indicating how and when the Email Accounts were accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the Email Accounts' owner/s.
5. Evidence indicating the Email Accounts' owner's and user's state of mind as it relates to the crimes under investigation.

6. All records, documents, invoices, or materials associated with the Email Accounts that concern accounts with an Internet service provider or a telephone service provider whose services may have been used in the commission of violations of 18 U.S.C. §§ 2, 371, 1952, and 2421.

### **III. Search Procedure**

- A. The warrant will be executed under the Electronic Communications Privacy Act, in particular 18 U.S.C. § 2703(a), (b)(1)(A), and (c)(1)(A), and will require Email Provider to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of this attachment.

- B. During its review of the information received from Email Provider under this warrant, law enforcement will segregate the information into two groups: (i) information that is responsive to the warrant and that the government may therefore seize; and (ii) information that is not responsive to the warrant. This review will be performed within a reasonable amount of

time not to exceed 180 days from the date of execution of the warrant. If the government needs additional time to conduct this review, it may seek an extension of the time period from the Court.

C. Information that is responsive to the warrant will be copied onto a separate storage device or medium. Responsive information may be used by law enforcement in the same manner as any other seized evidence. Information that is not responsive to the warrant will be sealed and stored on a secure medium or in a secure location. Nonresponsive information will not be reviewed again without further order of the Court (e.g., subsequent search warrant or order to unseal by the district court).

D. The government will retain a complete copy of the information received from Provider for a number of reasons, including proving the authenticity of evidence to be used at trial, responding to questions regarding the corruption of data, establishing the chain of custody of data, refuting claims of fabricating, tampering, or destroying data, and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.